

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ABRAHAM LEAVITT,

Plaintiff,

v.

CENTRAL CREDIT, LLC,

Defendant.

NO. 2:23-cv-01817-RAJ

DECLARATION OF ALEXANDER R.
MILLER IN SUPPORT OF DEFENDANT
CENTRAL CREDIT'S MOTION TO
DISMISS SECOND AMENDED
COMPLAINT UNDER RULES 12(B)(6)
AND 12(B)(1)

DECLARATION OF ALEXANDER R. MILLER

I, Alexander R. Miller, declare as follows:

1. I am an attorney duly licensed to practice law before all courts of the State of California and am an associate of Glaser Weil Fink Howard Jordan & Shapiro LLP, and admitted *pro hac vice* as counsel of record for Defendant Central Credit LLC ("Central Credit") in this matter. This declaration is submitted in support of Central Credit's Motion to Dismiss Second Amended Complaint ("Motion"). I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. On December 23, 2024, I met and conferred telephonically with Plaintiff's counsel Andrew B. Grimm for approximately 90 minutes via Microsoft Teams regarding

DECLARATION OF ALEXANDER R.
MILLER - 1
Case No. 2:23-cv-01817-RAJ

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1 Plaintiff's Second Amended Complaint (Dkt. #31, "SAC"), the substantive grounds for Central
2 Credit's Motion, and any opportunities to potentially resolve the Motion and/or the case in its
3 entirety. I also sent Plaintiff's counsel meet and confer correspondence by electronic mail on
4 December 23, 2024, and December 26, 2024. After discussing Central Credit's positions and its
5 anticipated arguments for its Motion in detail, the parties were unfortunately unable to reach a
6 resolution that would eliminate the need for the Motion.

7 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the
8 United States of America that the foregoing is true and correct, and that this declaration is
9 executed on December 26, 2024, in San Diego, California.

10
11 /s/ Alexander R. Miller

12 Alexander R. Miller (*Pro Hac*)
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19 *Attorneys for Defendant Central Credit, LLC*